



March 21, 2019

Ms. Audra Klumb
A&D Klumb Environmental LLC

Sent via e-mail to: SWH-tower@klumbenv.com

Dear Ms. Klumb:

Thank you very much for conducting a visual test of the 195-foot cell tower proposed by BRT Group, LLC off of Buttermilk Brook Road on Freeman Ridge in Southwest Harbor. We really appreciated the opportunity to assess the proposed tower's impacts on historic resources within the 4-mile Area of Potential Impact around the tower.

Friends of Acadia's mission is to preserve, protect, and promote stewardship of the natural beauty, ecological vitality, and distinctive cultural resources of Acadia National Park and the surrounding communities for the inspiration and enjoyment of current and future generations. Friends of Acadia staff hiked Beech Mountain Loop (eastern half) and Flying Mountain Trail on Tuesday, March 19, 2019 to view the balloons that were floated at the approximate height and location of the proposed cell tower. Staff also viewed the balloons from other important visitor destinations, such as Adams Bridge at the Bass Harbor Marsh, the Manset Town Dock, the Norwood Cove overlook on Route 102, and the Upper and Lower Town Docks in Southwest Harbor.

The historic nature of Acadia National Park's trail system is well-documented in the *Cultural Landscape Report for the Historic Hiking Trail System of Mount Desert Island* (<https://irma.nps.gov/DataStore/DownloadFile/492971>). Among the reasons that Acadia's trail system has been deemed eligible for the National Register of Historic Places is that the trails were carefully constructed to take hikers to prominent natural features and scenic vantage points with panoramic views. The last comprehensive survey of Acadia's visitors (<https://irma.nps.gov/DataStore/DownloadFile/559748>) indicated that 72% of Acadia's visitors use the trails at some point during their visit, and 95% of visitors ranked them as "Extremely Important" or "Very Important". The trails were built historically to show the scenic areas of Mount Desert Island to a broader array of people, and 96% of park visitors in the visitor survey ranked scenic views as "Extremely Important" or "Very Important". The trail system remains an important vehicle for enjoying Acadia National Park and the sweeping views its mountains provide.

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Upon viewing the balloon test, Friends of Acadia has concluded that the height of the proposed cell tower will diminish the scenic value of Acadia's trails, particularly Flying Mountain, and therefore will harm the historic value of the park's trails. FOA understands the importance of cellular connectivity to residents and park users; however, we believe thoughtful siting, screening, design, and ultimately, height must be carefully considered in this landscape adjacent to a national park. At 195-feet and situated on a ridge line, the BRT Group LLC's proposed cell tower would be the tallest communications tower on Mount Desert Island and would extend over tree-line by approximately 130 feet when viewed from the Flying Mountain Trail. Because Flying Mountain is a lower-elevation trail and the cell tower is silhouetted against the sky, the impacts are greater than at the summit of Beech Mountain, where the cell tower would be against a backdrop of the forested landscape extending to ocean's edge.

Mitigating these impacts to Acadia's historic trail system may be difficult, as well, due to the scale of BRT Group LLC's project. At 195-feet, the tower could not be camouflaged as a tree because it would tower too high above the nearby forest canopy. Painting the tower could be helpful, but it would be challenging to select a paint scheme that would blend the tower with the forest as viewed from Beech Mountain, and the sky as viewed from Flying Mountain. Reducing the height of the tower to something more similar to the existing cell tower on Freeman Ridge may be the best solution for preserving the viewshed from Acadia's historic trail system.

Thank you again for conducting this important visibility test of BRT Group LLC's proposed 195-foot cell tower on Freeman Ridge in Southwest Harbor and for the opportunity to provide feedback about the tower's impact on the historic value of Acadia's trail system. If you have any questions, please do not hesitate to contact me at 207-288-3340 or stephanie@friendsofacadia.org.

Sincerely,



Stephanie M. Clement
Conservation Director

cc: Jill Springer, Federal Communications Commission
Megan Rideout, Maine Historic Preservation Commission
John Kelly, National Park Service